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Hon. Paul G. Gardephe
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

May 13, 2025

US v. Gulkarov et al (Rolando Chumaceiro)
22 CR 20

Your Honor:

My client, Roland Chumaceiro, requests that his date of surrender to a designated Bureau of Prisons facility be amended from June 9, 2025 to July 31, 2025. Dr. Chumaceiro has not been contacted by the US Marshals. The reason for the request is that he must vacate his rental unit by July 31st after giving 60 days' notice. Any earlier termination of his lease will result in the loss of his security deposit. Additionally, he must now assist his wife in relocating her to Philadelphia, PA and cannot do so prior to the end of July when her new residence is ready.

Lastly, we are seeking to avoid any temporary incarceratory period at the MDC. Since the US Marshals have not yet reached out to Dr. Chumaceiro an extended period of time to surrender will give the Bureau of Prisons and US Marshals a longer period to assure us that he can surrender directly to Otisville Camp and not be housed at the MDC.

The Government does not object to this application.

We appreciate the Court's attention to this matter.

Respectfully,
/s/Matthew D. Myers
Attorney for Dr. Chumaceiro

Cc: AUSA Mat Andrews

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

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Dated: _____

Dated: May 14, 2025